

ANDREW M. MORSE, Atty. Reg. No. 4498
Snow, Christensen & Martineau
10 Exchange Place, 11th Floor
Post Office 45000
Salt Lake City, Utah 84145
Telephone: (801) 521-9000

MICHAEL J. OGBORN, Atty. Reg. No. 20932
MICHAEL J. KNAUF, Atty. Reg. No. 32032
Ogborn, Summerlin & Ogborn, LLC
1120 Lincoln Street, Suite 1100
Denver, Colorado 80203
Telephone: (303) 861-7472
Facsimile: (303) 831-0551
Attorney for Defendant
Global Communications Group, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH CENTRAL DIVISION

GWB, Inc.,

Plaintiff,

v.

GLOBAL CROSSING TELECOMMUNICATIONS,
INC. and GLOBAL COMMUNICATIONS GROUP,
INC. and John Does 1-10

Defendants.

**MOTION TO ALLOW
REPRESENTATIVE OF
DEFENDANT GLOBAL
COMMUNICATIONS GROUP,
INC. TO APPEAR
TELEPHONICALLY**

Case No.: 2:07-CV-0998

Judge: Clark Waddoups

Defendant, Global Communications Group, Inc., through its attorneys, submits this Motion to allow a representative of the company to provide telephonic testimony and in support thereof states:

1. The Court entered its Amended Notice of Hearing on Motion on January 9, 2009, requiring the parties appear in court to argue the matter of jurisdiction on January 21, 2009.
2. The representative for Defendant in this case resides and conducts business in Colorado. Mr. St. Germain is required to attend a conference in Colorado on this date that is integral to his business. It can not be rescheduled, and therefore, requests permission to appear telephonically.
3. Given the potential hardship to the company, it would be unduly burdensome for him to travel to Utah on January 21. Counsel for Defendant will be present at the hearing. Mr. St. Germain will be available to testify by phone as to his company's involvement in the incidents giving rise to this action.
4. At the hearing, Mr. St. Germain will not rely on any additional documents other than those previously filed with the Court.
5. Counsel for Defendant Global Communications has conferred with counsel for Defendant Global Crossing, who has no objection to the relief sought herein. Plaintiff has been contacted regarding its position to this motion, but has not responded as of its filing.

WHEREFORE, Global Communications Group, Inc, respectfully requests leave of this Court to provide telephonic testimony during the evidentiary hearing set for January 21, 2009 at 10:00 a.m.

Respectfully submitted this 19th day of January, 2009.

OGBORN, SUMMERLIN & OGBORN, LLC

/s/ Michael J. Knauf

MICHAEL J. OGBORN, Atty. Reg. No. 20932
MICHAEL J. KNAUF, Atty. Reg. No. 32032
1120 Lincoln St., Suite 1100
Denver, Colorado 80203
Phone: (303) 861-7472

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **MOTION TO ALLOW REPRESENTATIVE OF DEFENDANT GLOBAL COMMUNICATIONS GROUP, INC. TO APPEAR TELEPHONICALLY** was electronically filed with the Court and served on the following via CM/ECF on this 19TH day of January, 2009.

Mark L. Anderson
Law Office of Mark L. Anderson
977 South Orem Boulevard
Orem, Utah 84058

Brent V. Manning
Sammi V. Anderson
Manning Curtis Bradshaw & Bednar, LLC
Third Floor Newhouse Building
10 Exchange Place
Salt Lake City, Utah 84111

s/ Natalie Nail

Natalie Nail